

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

DENNIS WIERTELLA AS)	CASE NO.: 1:20-CV-02739
ADMINISTRATOR OF THE ESTATE)	
OF RANDY WIERTELLA, DECEASED,)	JUDGE: BRIDGET MEEHAN BRENNAN
AND FATHER FOR RANDY)	
WIERTELLA,)	<u>JOINT MOTION TO EXTEND</u>
)	<u>LIABILITY EXPERT DISCOVERY</u>
Plaintiff,)	<u>DEADLINE AND DISPOSITIVE</u>
)	<u>MOTION DEADLINE</u>
vs.)	
)	
LAKE COUNTY, OH, et al.,)	
)	
Defendants.)	

Now come the parties, by and through their respective counsel, and jointly move for an extension of the liability expert discovery deadline and dispositive motion deadline. Counsel for all parties discussed this anticipated accommodation with the Court at the settlement conference on April 28, 2022. Counsel have been in communication with each other and Defendants' liability experts to set the expert discovery depositions, but they could not be scheduled until May 20, 2022 (Dr. Surso) and May 23, 2022 (Dr. Wittstein). Because discovery of the liability experts will not be complete until May 23, 2022, the parties have agreed that the Lake County Defendants should be granted an extension of 21 days from the current May 24, 2022 deadline to file their dispositive motion.

WHEREFORE, the parties respectfully request an extension to and including May 23, 2022 within which to complete discovery of liability experts and an extension of the dispositive motion deadline to and including June 14, 2022.

s/Daniel P. Petrov (via email consent 5/9/22)

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CERTIFICATE OF SERVICE

I hereby certify that on May 9, 2022, a copy of the foregoing Joint Motion to Extend Liability Expert Discovery Deadline and Dispositive Motion Deadline was filed electronically. Notice of this filing will be sent to all registered parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

s/Kathleen M. Minahan

KATHLEEN M. MINAHAN (0064989)

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